



**Irathane
Systems
Incorporated**

US EPA RECORDS CENTER REGION 5



466133

RECEIVED

APR 4 1984

**MINN. POLLUTION
CONTROL AGENCY**

P.O. Box 276 • Hibbing, Minn. 55746 U.S.A. • Phone: 218/262-5211 Telex: 29-4446

March 26, 1984

Nancy Misra
MPCA
1935 W. County Rd. B-2
Roseville, MN 55113

Dear Nancy:

The following letter is in response to your letter of 3-19-84 regarding Irathane System's amended disclosure:

- 1). Items #1,2,4,5,7 of your letter have been clarified on each disclosure form as appropriate.
- 2). (Item #3): Irathane does not handle any wastes listed in CFR 40 261.33(e). As such, empty drums that are shipped with either Worum Chemical or Barrel Reconditioner for reclaiming, are not triple rinsed prior to shipment. In our phone conversation of 3-16-84 you stated, generally, that empty drums containing residuals of hazardous wastes must be triple rinsed prior to shipment. You also stated that MPCA does not recognize empty drums as being non-hazardous by the federal definition, (non-hazardous when containing less than one inch of residual). If MPCA has a new policy on triple rinsing all empty drums containing residuals of hazardous materials, please inform me of this.
- 3). (Item #5): Used crank case oil has been occasionally shipped off-site to oil refiners. It has also been used periodically as a dust controllant during hot, dry summer months. The instructions for actually "spredding" the oil were given to Irathane by MPCA, specifically John Pegors. If this procedure is now dis-allowed, please inform Irathane.
- 4). (Item #6): Waste #13 was shipped off-site on 9-13-83. MPCA should have received a copy of the manifest through the manifest tracking system. (Manifest #000017)
- 5). (Item #7): In 1983 the supplier of (4,4' diamino-diphenyl methane), or Waste #15, began listing the material as a liver toxin, among other health hazards. At that time Irathane began retaining the liners with residual (MDA) and storing the liners as a hazardous waste. Although the chemical is not a listed chemical on either table 261.33(e)

- IRATHANE • PRODUCTS DIVISION
- RUBBER PRODUCTS DIVISION

Manufacturers/Applicators of Elastomeric Protective Linings, Coatings and Casting Systems.

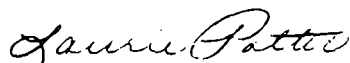
or table 261.33(f), (CFR 40), Irathane has chosen to be very cautious and ship the empty liners off as hazardous waste. The accumulation period for one drum of liners has been just under one year, and as such, Irathane is within the state regulations for on-site accumulation of hazardous wastes.

6). I am concerned with MN state's system of tracking hazardous waste shipments, namely the manifests. Irathane sends one yellow copy of each manifest to the Hopkins address, yet it looks as though MPCA is missing copies of several manifests. Where does the problem, lie? If MPCA has either misplaced the forms or did not receive the forms, please contact me, and I will send copies of the missing manifests.

7). Enclosed is the amended disclosure with changes made as listed above. Hopefully with the submission of this disclosure, accompanied by this letter, Irathane Systems will at long last receive approval of its hazardous waste management system.

Please contact me with any further questions.

Sincerely,



Laurie Potter
Environmental Consultant

cc: W.J. Valeri, ISI